

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Rasheed Underwood

Case: 2:22-mj-30019

Case No. Judge: Unassigned,

Filed: 01-12-2022 At 02:59 PM

USA v. SEALED MATTER(CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/18/20, 4/17/21, and 7/15/21 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

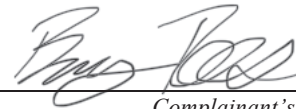
18 U.S.C. § 922(a)(6)

making a false statement during the acquisition
of a firearm on June 18, 2020; April 17, 2021; and
July 15, 2021.

This criminal complaint is based on these facts:

See attached.

☒ Continued on the attached sheet.

*Complainant's signature*Brady Rees - Special Agent, ATF*Printed name and title*

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 12, 2022

City and state: Detroit, MI

*Judge's signature*Anthony P. Patti, U.S. Magistrate Judge*Printed name and title*[Save](#)[Print](#)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Brady W. Rees, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since January 2016. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests for offenses enumerated under federal law. I have authored several federal search warrants, federal criminal complaints, and federal arrest warrants.

2. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. In addition, prior to my employment with ATF, I was a police officer with the City of Novi, Michigan, for approximately three years. I also have a bachelor’s degree in criminal justice.

3. I have participated in numerous criminal investigations, including investigations involving firearms, armed drug trafficking, and

criminal street gangs. As a law enforcement officer, I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources.

4. I have personal knowledge of or have been provided by other law enforcement officers with the facts set forth herein. I have not included every fact known to law enforcement concerning this investigation. I have only set forth the facts necessary to establish probable cause that Rasheed Abdoulah UNDERWOOD violated 18 U.S.C. § 922(a)(6) – making a false statement during the acquisition of a firearm on June 18, 2020; April 17, 2021; and July 15, 2021.

II. BACKGROUND OF THE INVESTIGATION

5. Beginning in the month of November 2021, ATF and the Detroit Police Department initiated an investigation of Rasheed UNDERWOOD for violations of federal firearm laws.

6. I reviewed a Computerized Criminal History (“CCH”) for UNDERWOOD and determined that he has no prior felony convictions.

7. During the month of November 2021, I reviewed National Integrated Ballistic Information Network (NIBIN) reports, along with Detroit Police reports, E-Trace reports, and ATF Form 4473s associated

with firearms purchased by Rasheed UNDERWOOD. These reports detailed three (3) different firearms purchased by Rasheed UNDERWOOD were associated with seven (7) different crime-related incidents in Detroit, Michigan. These reports detailed that two (2) of the firearms purchased by UNDERWOOD were used during crimes within 8 days of purchase. During my investigation I found UNDERWOOD purchased the following firearms:

- a. One (1) Glock, 43x, 9mm caliber, semi-automatic pistol, bearing serial number BNUY377, purchased from CC Coins (FFL) on June 18, 2020.
 - i. Law enforcement reporting shows this firearm is tied to four (4) crime-related events including:
 1. A robbery on June 22, 2020, on Faust Avenue in Detroit, Michigan;
 2. An Aggravated Assault on August 17, 2020, on Heyden Street in Detroit, Michigan;
 3. An Assault on August 24, 2020, on Heyden Street in Detroit, Michigan; and

4. A Weapons Violation on September 6, 2020
at Lafayette/Brush Street in Detroit,
Michigan.

b. One (1) Century Arms, Mini Draco, 7.62 caliber, semi-
automatic pistol, bearing serial number PF-5005-
2020ROA from CC Coins (FFL) on April 17, 2021.

c. One (1) Springfield Armory, XDM Elite, 9mm caliber,
semi-automatic pistol, bearing serial number
BA258531, purchased from Target Sports (FFL) on
July 15, 2021.

i. Law enforcement reporting shows this firearm is
tied to three crime-related events including:

1. The shooting of an unoccupied vehicle on
July 23, 2021, on Warwick Street in Detroit,
Michigan;
2. A Felonious Assault on October 25, 2021, on
Ilene Street in Detroit, Michigan;
3. A Weapons Violation on October 26, 2021,
on Pierson Street in Detroit, Michigan.

d. One (1) Glock, 19, 9mm caliber, semi-automatic pistol, bearing serial number BSXA712, purchased from Target Sports (FFL) on July 15, 2021.

i. Law enforcement reporting shows this firearm is tied to two (2) crime-related incidents including:

1. A Felonious Assault on October 25, 2021, on Ilene Street in Detroit, Michigan; and
2. A Weapons Violation on October 26, 2021, on Pierson Street, Detroit, Michigan.

8. ATF conducted a query in the LEIN law enforcement database for all firearms registered to UNDERWOOD in the state of Michigan. The search produced no results for firearms registered to UNDERWOOD. Accordingly, based on the LEIN results and additional investigation, I believe UNDERWOOD has not registered any of the above-referenced firearms that he purchased, as is required under Michigan state law.

9. On November 15, 2021, at approximately 1:10 P.M., myself and Detroit Police Department Task Force Officer (DPD TFO) Rutledge conducted an interview of UNDERWOOD in Detroit, Michigan. I

questioned UNDERWOOD regarding the purchase of the above reference firearms. UNDERWOOD stated the following:

- a. He has purchased approximately 6-7 firearms.
- b. He purchased each of the firearms for himself, for protection.
- c. He did not know what happened to any of the firearms he purchased and believed they were stolen.

10. During the interview, I provided UNDERWOOD with the ATF Form 4473s used to purchase the above-referenced firearms on June 18, 2020, April 17, 2021, and July 15, 2021, respectively. UNDERWOOD confirmed the 4473 forms shown to him were the forms he completed prior to each firearm purchase.

11. ATF Form 4473 is a firearm transaction record completed by purchasers and licensed sellers of firearms prior to the purchase of a firearm. The Form 4473 is required to be signed by the firearm purchaser with the certification that the answers are “true, correct, and complete.” By signing the form, the purchaser also acknowledges that he “understands that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime

punishable as a felony under Federal law, and may also violate State and/or local law.”

12. I questioned UNDERWOOD regarding his use of marijuana.

- a. UNDERWOOD advised he has smoked marijuana almost every day since he was approximately 15 years old.

13. UNDERWOOD confirmed to me that he checked the “no” box on question 11. e. on each of the 4473s utilized to purchase the above referenced firearms. Question 11. e. asks, “Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance?”

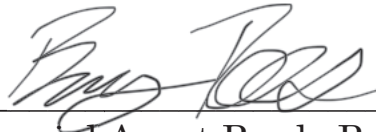
Warning: The use of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.”

- a. UNDERWOOD admitted he was in fact a user of marijuana at the time he purchased each of the firearms and checking the “no” box was not accurate.
- b. UNDERWOOD advised he had no knowledge of his firearms being used in any crimes.

14. Based on my training and experience, there is probable cause to believe that UNDERWOOD violated 18 U.S.C. § 922(a)(6). The violations occurred when UNDERWOOD knowingly made false statements regarding his drug use on question 11. e. of the ATF Form 4473 during his acquisition of a firearm on or about June 18, 2020, April 17, 2021, and July 15, 2021. Specifically, UNDERWOOD falsely stated he was not a user of marijuana, a controlled substance under federal law. The false statements were intended or likely to deceive the firearm dealers with respect to a fact material to the lawfulness of the sale of the firearm to UNDERWOOD. This is because, under 18 U.S.C. § 922(d), it is unlawful for a person to sell a firearm to an individual the seller knows or has reasonable cause to believe is an unlawful user of a controlled substance such as marijuana.

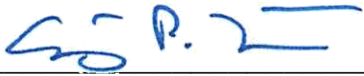
CONCLUSION

15. Based on the above facts, there is probable cause to believe that Rasheed Abdoulah UNDERWOOD violated 18 U.S.C. § 922(a)(6) – making a false during the acquisition of a firearm, on June 18, 2020, April 17, 2021, and July 15, 2021.



Special Agent Brady Rees
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

Dated: January 12, 2022